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## Vermont Household Hazardous Waste EPR Law Covered Products



### What HHW Products are covered under Act 58 – Vermont’s Household Hazardous Waste (HHW) Extended Producer Responsibility (EPR) Law?

The Vermont Household Hazardous Waste (HHW) Extended Producer Responsibility (EPR) Law ([Act 58 of 2023](#)) requires manufacturers of “covered household hazardous products” to provide free statewide collection of covered household hazardous products. Manufacturers must work with existing HHW collection programs operated by Vermont’s municipal solid waste management entities (“SWMEs”).

A “covered household hazardous product” is any consumer product offered for retail sale in Vermont that is contained in its original receptacle if the product, or a component of it, is defined as hazardous waste under [Vermont Hazardous Waste Management Regulations \(subchapter 2\)](#) regardless of the generator. “Covered household hazardous product” also includes certain gas cylinders.

Below are categories of products that may be considered “covered” under Vermont’s HHW EPR law. This list may not be inclusive of all possible types of covered products. Manufacturers of covered products are obligated to determine whether or not their product is covered as defined in this statute. Manufacturers can contact the ANR-DEC, Vermont Solid Waste Program (802-828-1138 [VTrecycles.com](http://VTrecycles.com)) if they would like assistance determining if a product is “covered.”

- Aerosols (flammable or toxic)
- Automotive products
- Fire Extinguishers (up to 50 pounds water capacity)
- Flammable degreasers
- Flammable lubricants
- Flammable liquid adhesives
- Furniture strippers
- Glues and adhesives
- Grout/Masonry cleaners
- Non-Bleach Hazardous cleaners with a pH level below 2 or above 12.5\*
- Lamp Kerosene
- Lighter fluid
- Marine, Auto, Field, Traffic, Road Paints
- Paint thinners, solvents and removers
- Rust remover
- Tar and bug remover
- Gas Cylinders:
  - Non refillable Helium, CO<sub>2</sub> and flammable (up to 50 pounds water capacity and no medical or industrial grade are covered)
  - Small Propane up to one pound (refillable and non-refillable)
  - Spray Foam Insulation Tanks (up to 50 pounds water capacity)

## **What products are NOT covered by the HHW EPR law?**

Products which are required to be registered with the VT Agency of Agriculture, Food and Markets (AAFM) [Pesticide Registration Law](#) are exempt from the HHW EPR law, such as:

- Pesticides
- Pool and Hot Tub Cleaners
- Insect Repellents
- Turf Products, and
- Cleaning Products containing Bleach and other Antimicrobial Agents.

All AAFM-registered pesticide products are not covered under HHW EPR law but may still be collected with other HHW products. VT AAFM uses manufacturers registration fees to defray collection costs for pesticides.

Other products not covered by the law—some of which may have existing EPR programs—include:

- Primary and Rechargeable Batteries (see Vermont's ["Special Recycling"](#) EPR program page)
- Mercury-Containing Lamps and Thermostats (see Vermont's ["Special Recycling"](#) EPR program page)
- Architectural Paint and Primers (see Vermont's ["Special Recycling"](#) EPR program page)
- Covered Electronic Devices (see Vermont's ["Special Recycling"](#) EPR program page)
- Pharmaceutical Drugs
- Citronella Candles
- Flea and Tick Collars
- Any products intended to be rubbed, poured, sprinkled on, sprayed on, introduced into, or otherwise applied to the human body or any part of a human for cleansing, moisturizing, sun protection, beautifying, promoting attractiveness, or altering appearance, unless designated as a hazardous material or a hazardous waste by the Secretary of Natural Resources.

### **Links**

- [VT HHW EPR web page](#)
- [VT Product Stewardship/EPR web page](#)
- [Resources for determining Pesticide Registration Status](#)
- [VT DEC Hazardous Waste Regulations](#)